

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**IN RE 2014 RADIOSHACK ERISA
LITIGATION**

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MASTER FILE NO. 4:14-cv-00959-O

**JOINT MOTION FOR ENTRY OF AGREED
PROTECTIVE ORDER ON CONFIDENTIALITY**

Plaintiffs Manoj P. Singh, Jeffrey Snyder, William A. Gerhart, and Steven Wolpin (collectively, “Plaintiffs”); Defendants RadioShack 401(k) Plan Administrative Committee, the RadioShack Puerto Rico Plan Administrative Committee, James F. Gooch, Joseph C. Magnacca, Robert E. Abernathy, Frank J. Belatti, Julia A. Dobson, Daniel A. Feehan, H. Eugene Lockhart, Jack L. Messman, Thomas G. Plaskell, Edwina D. Woodbury, Mark Barfield, Karina Davis, Eric Hales, Justin Johnson, Michael Keyser, Kevin Krautkramer, Martin Moad, and Sri Reddy (collectively, “RadioShack Defendants”); and Defendants Wells Fargo Bank, NA (“Wells Fargo”) and Banco Popular de Puerto Rico (“Banco Popular”) (collectively, the “Trustee Defendants,” and, together with the Plaintiffs and RadioShack Defendants, the “Parties”) hereby jointly move for entry of the Agreed Protective Order on Confidentiality (“Agreed Protective Order”) in the above-captioned case (the “Action”). In support of their Joint Motion, the Parties state as follows:

1. This Action is a class action pursuant to the Employee Retirement Income Security Act of 1974, 29 U.S.C. § 1001, *et seq.*, brought by Plaintiffs on behalf of the RadioShack 401(k) Plan and the RadioShack Puerto Rico 1165(e) Plan (the “Plans”).

2. The Parties have commenced discovery in this Action and agree that discovery will require production of documents and information that one or more Parties regards as containing sensitive and non-public business information, financial information, personnel information, personal information, trade secrets, or other confidential information. Disclosure of this information to the general public would be prejudicial to the Parties, and litigation over claims of confidentiality would unduly consume the resources and time of the Court and Parties.

3. The Parties have agreed to the terms and conditions set forth in the Agreed Protective Order on Confidentiality, submitted contemporaneously herewith, which defines “Confidential Material” (*see* Agreed Protective Order at ¶ I.D), and provides procedures for, *inter alia*, the designation, use, and handling of Confidential Material (*see id.* at §§ II, III).

WHEREFORE, for the reasons stated above, the Parties respectfully request that this Court enter the Agreed Protective Order on Confidentiality submitted contemporaneously herewith.

Dated: August 26, 2015

Respectfully submitted,

/s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2015, I electronically filed the foregoing with the clerk of Court using the CM/ECF system, which will send a notification to all counsel of record in this Action.

/s/ Roger L. Mandel

Roger L. Mandel